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Attorneys for Defendants

NATIONAL UNION FIRE INSURANCE

COMPANY OF PITTSBURGH, PA. *erroneously*

named as NATIONAL UNION FIRE

INSURANCE COMPANY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL
NO. 3, a trade union,

Plaintiff,

v.

NATIONAL UNION FIRE
INSURANCE COMPANY, and DOES 1
through 20, inclusive,

Defendant.

CASE NO. 3:14-CV-04702- CRB

**Matter Assigned to Honorable Judge
Charles R. Breyer**

**Discovery Matters Assigned to.
Magistrate Judge Donna M. Ryu**

**[State Court Case No. RG14712884,
Filed September 22, 2014]**

**JOINT STIPULATION AND
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE
AND RELATED DATES**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff,
International Union of Operating Engineers Local No. 3 ("IUOE Local 3") and
defendant National Union Fire Insurance Company of Pittsburgh, PA. ("National
Union") through their respective counsel of record, as follows:

1 WHEREAS this Court issued an Order setting the initial Case Management
2 Conference in this matter for January 23, 2015 (the “Order”);

3 WHEREAS the Order requires the parties to conduct the early meeting of
4 counsel by December 24, 2014-- 30 days before the Case Management
5 Conference, and to submit a Case Management Conference Statement by January
6 16, 2015—7 days before the Conference;

7 WHEREAS the local rules of the United States District Court Northern
8 District of California require that trial counsel participates in the early meeting of
9 counsel;

10 WHEREAS trial counsel for IUOE Local 3, E. Gerard Mannion, will be out
11 of the country and unavailable from December 12, 2014 through January 6, 2015,
12 and as Mr. Mannion has advised National Union that, given his schedule, he is
13 unavailable to effectively participate in the early meeting of counsel before his
14 departure;

15 WHEREAS National Union has agreed to a short continuance of the Case
16 Management Conference as a courtesy to accommodate Mr. Mannion’s schedule;

17 **IT IS HEREBY STIPULATED** by the parties and through their respective
18 counsel of record as follows:

19 1. That the Case Management Conference be continued from January 23,
20 2014 to March 6, 2015 at 8:30 a.m. or to any other date and time that are
21 convenient to the Court;

22 2. That the date by which counsel must conduct the early meeting of
23 counsel be continued from December 24, 2014 to a date which is 30 days before
24 the new Case Management Conference date;

25 3. That the date by which the parties must file a Case Management
26 Conference Statement be continued from January 16, 2015 to a date that is 7 days
27 before the new Case Management Conference date; and
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